

SCANNED

Benjamin P. Deutsch (BD-5435)
SCHNADER HARRISON SEGAL & LEWIS LLP
140 Broadway, Suite 3100
New York, New York 10005-1101
(212) 973-8000
(212) 972-8798 (fax)
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

GRACIANO CORPORATION,

Plaintiff,

v.

JOHN P. PICONE, INC., and
JAMES McCULLAGH CO., INC., trading/doing
business as PICONE/McCULLAGH
JOINT VENTURE, FEDERAL INSURANCE
COMPANY, and LIBERTY MUTUAL
INSURANCE COMPANY,

Defendants.

Civil Action No.: 08-CV-6907 (JFK)

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Benjamin P. Deutsch, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Robert J. Williams, Esquire
Schnader Harrison Segal & Lewis LLP
120 Fifth Avenue, Suite 2700
Pittsburgh, PA 15222-3001
Phone: 412-577-5200
Facsimile: 412-765-3858

ROBERT J. WILLIAMS is a member in good standing of the Bar of the State of Pennsylvania. There are no pending disciplinary proceedings against Mr. Williams in any State or Federal Court.

Dated: New York, New York
August 11, 2008

SCHNADER HARRISON SEGAL &
LEWIS LLP

By: 

Benjamin P. Deutsch (BD-5435)
140 Broadway, Suite 3100
New York, New York 10005
(212) 973-8000
(212) 972-8798 (fax)
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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GRACIANO CORPORATION,

Plaintiff,

v.

JOHN P. PICONE, INC., and
JAMES McCULLAGH CO., INC., trading/doing
business as PICONE/McCULLAGH
JOINT VENTURE, FEDERAL INSURANCE
COMPANY, and LIBERTY MUTUAL
INSURANCE COMPANY,

Defendants.

-----X

Civil Action No.: 08-CV-6907 (JFK)

**AFFIDAVIT OF BENJAMIN P.
DEUTSCH IN SUPPORT OF
MOTION TO ADMIT COUNSEL
PRO HAC VICE**

State of New York)
)ss:
County of New York)


Benjamin P. Deutsch, being duly sworn, hereby deposes and says as follows:

1. I am a partner at Schnader Harrison Segal & Lewis LLP, counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Robert J. Williams as counsel *pro hac vice* to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1996. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Mr. Williams for more than four (4) years.
4. Mr. Williams is a partner at Schnader Harrison Segal & Lewis LLP in Pittsburgh, Pennsylvania.

5. I have found Mr. Williams to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.
6. Accordingly, I am pleased to move the admission of Robert J. Williams, *pro hac vice*.
7. I respectfully submit a proposed order granting the admission of Robert J. Williams, *pro hac vice*, which is attached hereto as Exhibit A.

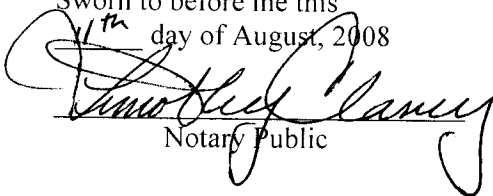
WHEREFORE, it is respectfully requested that the motion to admit Robert J. Williams, *pro hac vice*, to represent Plaintiff in the above captioned matter, be granted.

Respectfully Submitted,



Benjamin P. Deutsch, Esquire (BD-5435)

Sworn to before me this
11th day of August, 2008



Notary Public

TIMOTHY CLANCY
NOTARY PUBLIC, State of New York
No. 01CL5021469
Qualified in New York County
Commission Expires Dec. 13, 2011



Supreme Court of Pennsylvania

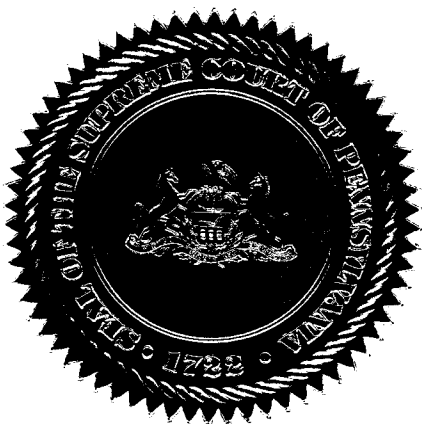
CERTIFICATE OF GOOD STANDING

Robert John Williams, Esq.

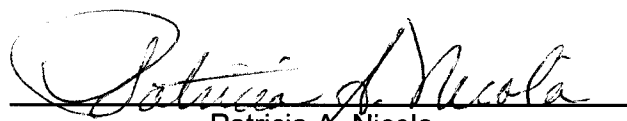
DATE OF ADMISSION

November 22, 1995

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal
Dated: August 4, 2008


Patricia A. Nicola
Chief Clerk

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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GRACIANO CORPORATION,

Plaintiff,

v.

JOHN P. PICONE, INC., and
JAMES McCULLAGH CO., INC., trading/doing
business as PICONE/McCULLAGH
JOINT VENTURE, FEDERAL INSURANCE
COMPANY, and LIBERTY MUTUAL
INSURANCE COMPANY,

Defendants.
-----X

Civil Action No.: 08-CV-6907 (JFK)

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of Benjamin P. Deutsch, attorney for Plaintiff, Graciano Corporation, and Mr. Deutsch's affidavit in support;

IT IS HEREBY ORDERED that:

Robert J. Williams, Esquire
Schnader Harrison Segal & Lewis LLP
120 Fifth Avenue, Suite 2700
Pittsburgh, PA 15222-3001
Phone: 412-577-5200
Facsimile: 412-765-3858
rwilliams@schnader.com

is admitted to practice *pro hac vice* as counsel for Plaintiff, Graciano Corporation, in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: New York, New York
August __, 2008

United States District Judge

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

Timothy Clancy, being duly sworn, deposes and says, deponent is not a party to this action, is over eighteen (18) years of age and resides in Monmouth County, New Jersey.

On August 11, 2008, I served a true copy of the attached MOTION TO ADMIT COUNSEL PRO HAC VICE, with accompanying documents, upon:

John P. Picone, Inc.
31 Garden Lane, Box 9013
Lawrence, New York 11559-9013

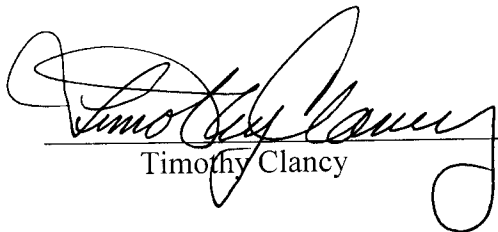
Picone/McCullagh Joint Venture
31 Garden Lane
Lawrence, New York 11559

James McCullagh Co., Inc.
75 E. Bethpage Road, Box 6011
Plainview, New York 11803-0611

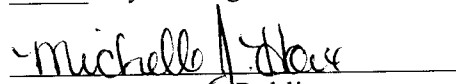
Federal Insurance Company
15 Mountain View Road
Warren, New Jersey 07061

Liberty Mutual Insurance Company
175 Berkeley Street
Boston, Massachusetts 02116

by First Class Mail.


Timothy Clancy

Sworn to before me this
11th day of August, 2008


Notary Public

MICHELLE J. HOVE
Notary Public, State of New York
No. 01HO6125278
Qualified in Nassau County
Commission Expires April 11, 20 